IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

EDGE CAPTURE L.L.C. and EDGE) SPECIALISTS, L.L.C.,)	
Plaintiffs,	Civil Action No. 09 CV 1521
v.)	JURY TRIAL DEMANDED
BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., UBS AG, UBS FINANCIAL SERVICES INC., UBS SECURITIES, L.L.C., WOLVERINE TRADING, L.L.C., AND WOLVERINE EXECUTION SERVICES, L.L.C.,	Judge Charles R. Norgle, Sr. Magistrate Judge Denlow
Defendants.	

PLAINTIFFS' MOTION TO FILE UNDER SEAL ITS RESPONSE IN OPPOSITION TO DEFENDANTS WOLVERINE TRADING, LLC AND WOLVERINE EXECUTION SERVICES, LLC'S MOTION TO COMPEL PAYMENT BY PLAINTIFFS OF ONE HALF INITIAL DISCLOSURE COSTS IN COMPLIANCE WITH COURT ORDERS OF AUGUST 9, 2011 AND SEPTEMBER 27, 2011

Plaintiffs Edge Capture L.L.C. and Edge Specialists, L.L.C. ("Edge"), by and through their undersigned attorneys, and pursuant to Local Rule 26.2 of the United States District Court for the Northern District of Illinois, respectfully request the filing, under seal, of Plaintiffs' Response in Opposition to Wolverine's Motion to Compel Payment by Plaintiffs of One Half Initial Disclosure Costs in Compliance with Court Orders of August 9, 2011 and September 27, 2011 ("Response") and accompanying exhibits. In support of this Motion, Edge states as follows:

1. A Protective Order between the parties, entered by the Court on September 27,

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2011, governs the filing of sealed exhibits. (See Ex. A, Protective Order, D.E. 241.)

2. On August 22, 2012, Wolverine requested permission to file under seal its

Memorandum and Exhibits (D.E. 304) related to its Motion to Compel. Wolverine's motion to

file under seal indicates that its Memorandum and Exhibits contain confidential information

regarding (1) Wolverine's proprietary trading system and/or (2) Wolverine's executive's and

attorneys' billing rates and billing descriptions performed in the case. (D.E. 301.)

3. Edge's Response and Exhibits reference this same confidential information and

also includes documents designated under the Protective Order as "Highly Confidential."

4. Edge seeks to comply with the Agreed Protective Order in this case and the

confidentiality designations in place as of the date of this filing.

5. Wolverine has requested that its entire submission be filed under seal because the

pervasiveness of Confidential and Highly Confidential material within its Memorandum makes it

is impossible to create a meaningful public record. (D.E. 301.) For this same reason, Edge

respectfully requests to file its Response and Exhibits under seal in their entirety.

WHEREFORE, Edge respectfully requests an order permitting it to file the referenced

materials under seal.

Dated: August 31, 2012

Respectfully submitted,

By: /s/ Justin R. Gaudio_

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ATTORNEYS FOR PLAINTIFFS EDGE CAPTURE L.L.C. AND EDGE SPECIALISTS, L.L.C. Case: 1:09-cv-01521 Document #: 308 Filed: 08/31/12 Page 4 of 4 PageID #:9607

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on August 31, 2012, he caused a true and correct copy of PLAINTIFFS' MOTION TO FILE UNDER SEAL ITS RESPONSE IN OPPOSITION TO DEFENDANTS WOLVERINE TRADING, LLC AND WOLVERINE EXECUTION SERVICES, LLC'S MOTION TO COMPEL PAYMENT BY PLAINTIFFS OF ONE HALF INITIAL DISCLOSURE COSTS IN COMPLIANCE WITH COURT ORDERS OF AUGUST 9, 2011 AND SEPTEMBER 27, 2011 to be served on the below parties through the CM/ECF system:

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/s/ Justin R. Gaudio_____

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